



**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**  
Caption in Compliance with D.N.J. LBR 9004-1(b)

**RAS Citron, LLC**  
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Fairfield, NJ 07004  
Telephone: 973-575-0707  
Attorneys for Secured Creditor

Laura Egerman, Esq. (LE-8250)

Order Filed on September 21, 2020  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

In Re:

**GEORGE SARIOTIS,**  
Debtor.

Case No.: 19-32528-MBK

Chapter 11

Hearing Date: September 24, 2020

Judge: Michael B. Kaplan

**CONSENT ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY AS TO  
1801 PITNEY STREET, OAKHURST, NEW JERSEY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby  
**ORDERED.**

**DATED: September 21, 2020**

A handwritten signature of Michael B. Kaplan in black ink, appearing to read "Michael B. Kaplan".  
\_\_\_\_\_  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge

THIS MATTER having come before the Court on the Motion for Relief from the Automatic Stay (the "Motion") (Docket #39) filed by RAS Citron, LLC, counsel for Secured Creditor, SPECIALIZED LOAN SERVICING, LLC ("Secured Creditor"), as to the real property commonly known as 1801 PITNEY STREET, OAKHURST, NEW JERSEY 07755 (the "Property"), and Geoffrey Neumann, Esq., representing the debtor GEORGE SARIOTIS (the "Debtor"), and the parties agreeing to the entry of the Order settling the Objection, and for good cause shown; it is ORDERED AND DECREED as follows:

1. This order shall be incorporated in and become a part of any Chapter 11 Plan of Reorganization in the herein matter.
2. Secured Creditor shall retain its first mortgage lien on the Property and none of its rights are being modified.
3. The parties hereby agree that Debtor shall make adequate protection payments to Secured Creditor in the amount of \$1,211.47 each, beginning on October 15, 2020. Payments should be sent to the following address:

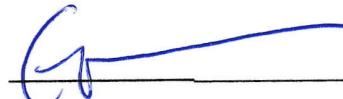
Specialized Loan Servicing, LLC  
P.O. Box 636007  
Littleton, Colorado 80163  
Account #: XXXX751161

4. Debtor must complete the sale of the Property within twelve (12) months of the date of this Order.
5. If any adequate protection payment is not made within fifteen (15) days of its due date and/or the sale of the Property is not completed as provided by the deadline set forth in this order, such failure shall constitute a default of this Order. Upon default Secured Creditor shall be entitled to file an Affidavit of Default. Upon filing of an Affidavit of Default the Court shall, without further hearing, enter an order terminating the automatic stay, after which Secured Creditor shall be allowed to proceed with any and all non-bankruptcy remedies provided under state law or the existing loan documents, without any further or other order, notice, or proceeding of this Court. Debtor agrees not to interfere with Secured Creditor's rights and remedies upon default. .
6. In consideration of the aforementioned, Secured Creditor's Motion for Relief can be marked as resolved.

7. The parties agree that this Consent Order in no way alters, amends, or invalidates any applicable bankruptcy remedies afforded to them.
8. Facsimile signatures shall be valid as original signatures and this Consent Order may be executed in counterparts.

The undersigned hereby consent to the form and entry of the foregoing order.

BROEGE, NEUMANN, FISCHER  
& SHAVER



Geoffrey Neumann, Esq.

*Attorney for Debtor*

Date: 9/18/20

RAS CITRON, LLC

/s/ Laura Egerman

Laura Egerman, Esq.

*Attorney for Secured Creditor*

Date: 09/18/2020

**Certificate of Notice Page 4 of 4**  
**United States Bankruptcy Court**  
**District of New Jersey**

In re:  
 George Sariotis  
 Debtor

Case No. 19-32528-MBK  
 Chapter 11

**CERTIFICATE OF NOTICE**

District/off: 0312-3

User: admin  
 Form ID: pdf903

Page 1 of 1  
 Total Noticed: 1

Date Rcvd: Sep 21, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 23, 2020.

db George Sariotis, 1801 Pitney St, Oakhurst, NJ 07755-2840

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
 NONE.

TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE.

TOTAL: 0

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

**Meeting of Creditor Notices only (Official Form 309):** Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Sep 23, 2020

Signature: /s/Joseph Speetjens

**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 21, 2020 at the address(es) listed below:

David B. Grantz on behalf of Creditor ckelly@meyner.com	Two River Community Bank dgrantz@meyner.com,
Laura M. Egerman on behalf of Creditor bkyecf@rasflaw.com;legerman@rasnj.com	SPECIALIZED LOAN SERVICING, LLC bkyecf@rasflaw.com,
Laura M. Egerman on behalf of Creditor bkyecf@rasflaw.com;legerman@rasnj.com	Selene Finance LP bkyecf@rasflaw.com,
Laura M. Egerman on behalf of Creditor bkyecf@rasflaw.com;legerman@rasnj.com	U.S. BANK NATIONAL ASSOCIATION bkyecf@rasflaw.com,
Lauren Bielskie on behalf of U.S. Trustee Linda T. Snyder on behalf of Creditor	U.S. Trustee lauren.bielskie@usdoj.gov Two River Community Bank lsnyder@meyner.com
Matthew Patrick Dolan on behalf of Creditor	Two River Community Bank mdolan@meyner.com
Timothy P. Neumann on behalf of Debtor George Sariotis	timothy.neumann25@gmail.com, btassillo@aol.com;geoff.neumann@bnfsbankruptcy.com;geoff.neumann@gmail.com
U.S. Trustee	USTPRRegion03.NE.ECF@usdoj.gov

TOTAL: 9